

**From:** [Josiam, Raji](#)  
**To:** ["Matt Wickham"](#)  
**Cc:** [Eric Pastor](#); [Lam Tran](#)  
**Subject:** RE: Background Sampling Area  
**Date:** Thursday, September 22, 2016 1:52:33 PM  
**Attachments:** [Determination of Background Concentrations at Haz Waste Sites.pdf](#)  
[image010.png](#)

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Matt

I discussed the background sampling location with Lam and also checked with EPA's risk assessors. I have talked to other RPMs and RCRA personnel at EPA to get an idea of background locations they have used for their sites and have been doing some research on this as well. I found an Engineering Paper written by the Engineering Forum of the EPA as a guidance on background sampling and have attached it for reference. The guidance says that the background site should be a site that is geologically similar and has similar biological, physical and chemical characteristics as the contaminated site and should be upwind of the site.

Let's have a conference call should discuss the best approach. Lam and I available from 11 am – 4 pm tomorrow. Let us know what time works.

Here are points for our discussion.

- What are the different locations you considered for background sampling?
- Your reason for choosing the new location. Any evidence of dumping in the area? What is wind direction in the area?
- Revise depths of sampling to account for fill and use of chemicals in the residential area.
- Any other areas in the vicinity with old trees, concrete pads etc?
- Consider multiple areas and get average to get a better background value for the area; revise number of samples in one area.
- Other

Since cleanup values will depend on background levels and risk levels, it is important to get a good background location and document the reasons for selecting the background location.

*Raji Josiam*

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**From:** Matt Wickham [<mailto:matt.wickham@pbwllc.com>]

**Sent:** Monday, September 19, 2016 10:48 AM

**To:** Josiam, Raji

**Cc:** Eric Pastor ; Lam Tran

**Subject:** RE: Background Sampling Area

Raji, Lam – attached is a screen shot from the 1944 aerial image. I've labeled the approximate area

we propose to sample. The original location is to the west in the area that was once a set of borrow pits for sand and gravel (I didn't label that).

I got this image from Google Earth. If you zoom in on the area in Google Earth and then go to View, then check Historical Imagery, you can scroll back in time through all of the older images of the site, including the image I attached.

Call me if you have any questions.

Regards,

Matt

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**From:** Josiam, Raji [<mailto:josiam.rajii@epa.gov>]

**Sent:** Monday, September 19, 2016 10:26 AM

**To:** Matt Wickham <[matt.wickham@pbwllc.com](mailto:matt.wickham@pbwllc.com)>

**Cc:** Eric Pastor <[eric.pastor@pbwllc.com](mailto:eric.pastor@pbwllc.com)>; Lam Tran <[lam.tran@tceq.texas.gov](mailto:lam.tran@tceq.texas.gov)>

**Subject:** RE: Background Sampling Area

Matt

Can you send us the aerials for the area from 1944? We'll take a look also so that we all are on the same page. Thanks.

*Raji Josiam*

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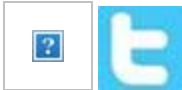
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**From:** Matt Wickham [<mailto:matt.wickham@pbwllc.com>]

**Sent:** Friday, September 16, 2016 9:13 AM

**To:** Josiam, Raji <[josiam.rajii@epa.gov](mailto:josiam.rajii@epa.gov)>

**Cc:** Eric Pastor <[eric.pastor@pbwllc.com](mailto:eric.pastor@pbwllc.com)>

**Subject:** Background Sampling Area

Raji – I've been talking with Bob Allen and Libby Guynn with the Harris County Pollution Control Services (HCPCS) about suitable locations for background sampling and we have researched several locations. We've settled on a location that was suggested by Libby Guynn and supported by Bob Allen. The proposed location is just on the other side of Vince Bayou from our initial location (see attached map).

Some details:

- The area is currently vacant and has always been either vacant or residential – no industrial or commercial use (since 1944, as far back as the aerial imagery exists)
- The area is adjacent to the bayou and therefore would allow us to sample both a tidally-influenced area and a non-tidally influenced area, consistent with the RI/FS Work Plan
- The property is owned by the Harris County Flood Control District.

It is very similar to our initial location.

I would appreciate your thoughts. If the location is acceptable, we will revise the WRN.  
Regards,  
Matt



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